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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

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|-------------------|---|-------------------------------|
| ANTHONY MASAPOLLO | : | CHAPTER 13 |
| LUCIA MASAPOLLO, | : | |
| | : | |
| DEBTORS. | : | NO. 19-14942 (MDC) |
| | : | |
| | : | Hearing Date: 1/14/20 |
| | : | Time: 10:30 a.m. |
| | : | Courtroom #2 |
| | : | 900 Market Street |
| | : | Philadelphia, PA 19107 |

**DEBTORS' RESPONSE IN OPPOSITION TO
LAKEVIEW LOAN SERVICING MOTION FOR RELIEF FROM THE AUTOMATIC
STAY**

The Debtors, Anthony and Lucia Masapollo hereinafter referred to as the "Debtors," by and through their counsel, Center City Law Offices, LLC, hereby respectfully file their response in opposition to Lakeview Loan Servicing, LLC Motion for Relief from the Automatic Stay. For the reasons more fully set forth below, the Debtors submit that there is no basis for Lakeview's motion.

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Debtors have made certain payments since the filing of the instant petition.

Debtors have also filed for a loan modification and have submitted all documents through their housing counselor.

7. Denied as to whether Movant is entitled to such additional fees under the terms of the mortgage documents.
8. Denied. See response to paragraph six (6) above.
9. Denied. Debtor has made certain payments to the trustee.
10. Denied as a matter of law.
11. Denied in that Movant does not need relief from the stay to enter into a loan modification or offer additional recourse to the Debtors.
12. Denied as a matter of law.

WHEREFORE, the Debtors, Anthony and Lucia Masapollo, respectfully pray this Honorable Court deny any and all relief requested presently by Lakeview Loan Servicing, LLC.

Respectfully submitted,
CENTER CITY LAW OFFICES, LLC

By: *Maggie S. Soboleski*
Pa. Id. No.: 88268
2705 Bainbridge Street
Philadelphia, PA 19146
Tele.: 215-620-2132
E-Mail: msoboles@yahoo.com

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